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Attorneys for Johnson Matthey Testing and Development and Johnson Matthey Incorporated

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re : Chapter 11

GENERAL MOTORS CORPORATION, et al. :

: Case No. 09-50026 (REG)

Debtors.

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## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS PURSUANT TO § 1109(b) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULES 2002(g) AND 9010

NOTICE IS HEREBY GIVEN pursuant to § 1109(b) of title 11 of the United States Code ("Bankruptcy Code") and Rule 9010 of the Federal Rules of Bankruptcy Procedure ("Bankruptcy Rules") that Saul Ewing LLP appears for and on behalf of Johnson Matthey Testing and Development and Johnson Matthey Incorporated (collectively, "Johnson Matthey") in these bankruptcy cases.

**NOTICE IS FURTHER GIVEN** that Johnson Matthey requests that all notices given or required to be given in the above-captioned chapter 11 cases (including, but not limited to, all papers filed and served in all adversary proceedings in such case, and all notices mailed only to the statutory committees or their authorized agents, as such may be duly appointed or designated,

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and to creditors and equity security holders who file with the Court and request that all notices be mailed to them), be given to and served upon the following:

Teresa K.D. Currier, Esquire Saul Ewing LLP 222 Delaware Avenue, Suite 1200 P.O. Box 1266 Wilmington, DE 19899 Telephone: (302) 421-6826

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PLEASE TAKE FURTHER NOTICE that, pursuant to 11 U.S.C. § 1109(b), the foregoing request includes not only notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint, disclosure document of any kind, conference, hearing or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, telephone, facsimile transmission, telegraph, telex or otherwise, which affect or seek to effect in any way any rights or interest of Johnson Matthey.

**PLEASE TAKE FURTHER NOTICE** that, as provided in Federal Rule of Bankruptcy Procedure 3017(a), Johnson Matthey requests that its attorneys be provided with copies of any and all disclosure statements and plans of reorganization.

This Notice of Appearance and Request for Service of Papers shall not be deemed or construed to be a waiver of the rights of Johnson Matthey (i) to have final orders in non-core matters entered only after *de novo* review by a District Judge, (ii) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (iii) to have the District Court withdraw the reference in any matters subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, setoffs, or recoupments to which it may be

entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments it expressly reserves.

## **SAUL EWING LLP**

\_/s/ Teresa K.D. Currier\_

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Dated: June 12, 2009